

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
)	Criminal No. 1:14-CR-306
v.)	
)	
PEDRO ANTHONY ROMERO CRUZ,)	The Honorable Gerald Bruce Lee
et al.,)	
)	
Defendants)	
)	

PROTECTIVE ORDER

This matter comes before the Court upon the Motion of the United States for a Protective Order to prevent the unauthorized disclosure or dissemination of sensitive information produced by the government in accordance with its *Brady* obligations. Having found that the government has demonstrated good cause to justify a Protective Order to limit disclosure of the identity of a prospective material witness (hereafter "Protected Information"), it is hereby

ORDERED that the Protected Information shall be subject to the following protective measures:

1. The government shall disclose the Protected Information to the defendants' attorneys of record who will be responsible for safeguarding the Protected Information;
2. Access to the Protected Information shall be restricted to the attorneys of record as well as any other attorneys and support staff employees who assist the attorneys of record in the preparation of a material witness warrant;
3. The attorneys shall NOT DISCLOSE the identity of the prospective material witness to their client until:

- (a) the Court has scheduled a deposition for the testimony of the prospective material witness in accordance with Title 18, United States Code, Section 3144 and Rule 15 of the Federal Rules of Criminal Procedure;
 - (b) 30 days before trial if the prospective material witness remains detained by Order of the Court; or
 - (c) otherwise ordered by the Court.
- 4. No copies of any kind shall be made of the Protected Information;
 - 5. The Protected Information shall not be used for any purpose other than preparing to defend the client against the charges filed in this case;
 - 6. The attorneys of record shall inform any person to whom disclosure is made of the existence and terms of this Order;
 - 7. The attorneys of record shall return the Protected Information to the government at the conclusion of this case and any direct appeal.

It is further ORDERED that the government's motion shall be sealed until further order of the Court.

ENTERED this 9 day of September 2015
Alexandria, Virginia

/s/
Gerald Bruce Lee
United States District Judge

The Honorable Gerald Bruce Lee
United States District Judge